

GIBBONS P.C.
One Pennsylvania Plaza, 37th Floor
New York, New York 10119-3701
Telephone: (212) 613-2000
Facsimile: (212) 290-2018
Natasha M. Songonuga
Email: nsongonuga@gibbonslaw.com
Counsel for American Lebanese Syrian Associated Charities, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:
SEARS HOLDINGS CORPORATION, *et al.*,
Debtors.¹

Chapter 11
Case No. 18-23538 (RDD)
Jointly Administered

NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that request is made by counsel for creditor American Lebanese Syrian Associated Charities, Inc., a not-for-profit, section 501(c)(3) corporation, founded by the late entertainer Danny Thomas in 1957 to raise funds and awareness exclusively for the support of St. Jude Children's Research Hospital ("ALSAC"), in the above-referenced case, in accordance with 11 U.S.C. § 1109(b) and Fed. R. Bankr. Proc. Rules 2002 and 9010(b)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovol Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365).

(“Rules”), that all papers, pleadings, motions and applications served or required to be served in this case, be given to and served upon:

Natasha M. Songonuga, Esq. GIBBONS P.C. 300 Delaware Avenue, Suite 1015 Wilmington, DE 19801-1671 Telephone: (302) 518-6324 Facsimile: (302) 429-6294 E-mail: nsongonuga@gibbonslaw.com
--

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Rules specified above, but also includes without limitation orders and notices of any application, motion, petition, pleading, request, complaint of demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, e-mail, delivery, telephone, telegraph, telex, or otherwise, which may affect or seek to affect in any way any rights or interests of creditors with respect to the Debtors or any related entity, or property or proceeds thereof in which the Debtors may claim an interest.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive ALSAC’s rights: (i) to have final orders in non-core matters, as well as statutory core matters in which the court lacks the Constitutional authority to enter a final order absent the consent of the parties, entered only after de novo review by a district court judge; (ii) to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; and (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or any other rights, claims, actions, defenses, setoffs or recoupments to which ALSAC is and/or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that this appearance and request for notice is made without prejudice to ALSAC's rights, remedies and claims against other entities. All rights, remedies and claims are hereby expressly reserved.

Dated: October 22, 2018
Wilmington, Delaware

GIBBONS P.C.

By: /s/ Natasha M. Songonuga
Natasha M. Songonuga, Esq. (Bar No. 5391)
300 Delaware Ave, Suite 1015
Wilmington, DE 19801-1761
Telephone: (302) 518-6300
Facsimile: (302) 429-6294
E-mail: nsongonuga@gibbonslaw.com

Counsel for American Lebanese Syrian Associated Charities, Inc.